

1 **JENNIFER BERGH**  
Nevada Bar No. 14480  
2 **QUILLING SELANDER LOWNDS**  
3 **WINSLETT & MOSER, P.C.**  
6900 N. Dallas Parkway, Suite 800  
4 Plano, Texas 75024  
Telephone: (214) 560-5460  
5 Facsimile: (214) 871-2111  
[jbergh@qslwm.com](mailto:jbergh@qslwm.com)  
6 **COUNSEL FOR TRANS UNION LLC**

7 **\*\*Designated Attorney for Personal Service\*\***  
Trevor Waite, Esq.  
8 Nevada Bar No.: 13779  
9 6605 Grand Montecito Parkway, Suite 200  
Las Vegas, Nevada 89149

11 **IN THE UNITED STATES DISTRICT COURT**  
12 **FOR THE DISTRICT OF NEVADA**

13 JOSE ALVAREZ,

14 Plaintiff,

15 v.

16 BANK OF AMERICA, N.A., TRANSUNION  
17 LLC, EXPERIAN INFORMATION  
18 SOLUTIONS, INC., and EQUIFAX  
INFORMATION SERVICES, LLC,

19 Defendants.

Case No. 2:19-cv-01681-RFB-DJA

**JOINT STIPULATION AND ORDER  
EXTENDING DEFENDANT TRANS  
UNION LLC'S TIME TO FILE AN  
ANSWER OR OTHERWISE RESPOND  
TO PLAINTIFF'S COMPLAINT  
(FIRST REQUEST)**

20 Plaintiff Jose Alvarez ("Plaintiff") and Defendant Trans Union LLC ("Trans Union"), by  
21 and through their respective counsel, file this Joint Stipulation Extending Defendant Trans  
22 Union's Time to File an Answer or Otherwise Respond to Plaintiff's Complaint.

23 On September 26, 2019, Plaintiff filed his Complaint. The current deadline for Trans  
24 Union to answer or otherwise respond to Plaintiff's Complaint is October 21, 2019. The  
25 allegations in Plaintiff's Complaint date back to March 2019. Trans Union requires additional  
26 time to locate and assemble the documents relating to Plaintiff's allegations, any disputes  
27 Plaintiff submitted to Trans Union, and Trans Union's investigation of any such disputes.  
28

1 Further, Trans Union's counsel will need additional time to review the documents and respond to  
2 the allegations in Plaintiff's Complaint.

3 Plaintiff has agreed to extend the deadline in which Trans Union has to answer or  
4 otherwise respond to Plaintiff's Complaint up to and including November 4, 2019. This is the  
5 first stipulation for extension of time for Trans Union to respond to Plaintiff's Complaint.

6 Dated this 21<sup>st</sup> day of October 2019.

7  
8 **QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.**

9  
10 */s/ Jennifer Bergh*

11 **JENNIFER BERGH**

12 Nevada Bar No. 14480

13 6900 N. Dallas Parkway, Suite 800

14 Plano, TX 75024

15 Telephone: (214) 871-2100

16 Facsimile: (214) 871-2111

17 [jbergh@qslwm.com](mailto:jbergh@qslwm.com)

18 ***Counsel for Trans Union LLC***

19 **PETERS AND ASSOCIATES, LLP**

20  
21 */s/ Cam-Tu Dang*

22 **CAM-TU DANG**

23 Nevada Bar No. 13093

24 6173 S. Rainbow Blvd.

25 Las Vegas, NV 89118

26 Telephone: (702) 818-3888

27 Facsimile: (702) 583-4940

28 [cam@pandalawfirm.com](mailto:cam@pandalawfirm.com)

***Counsel for Plaintiff***

**ORDER**

The Joint Stipulation for Extension of Time for Trans Union LLC to file an answer or otherwise respond is so ORDERED AND ADJUDGED.

Dated this 22nd day of October, 2019.



**UNITED STATES MAGISTRATE JUDGE**